



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

FEB 27 2014

OFFICE OF
WATER AND WATERSHEDS

Ms. Karla Urbanowicz
Oregon Department of Environmental Quality
Water Quality Division
811 SW 6th Avenue
Portland, Oregon 97204

Re: EPA Comments on Draft 2012 Integrated Report

Dear Ms. Urbanowicz:

Thank you for the opportunity to review and comment upon Oregon Department of Environmental Quality's (ODEQ) Draft 2012 Integrated Report (IR). EPA appreciates the early involvement with the 303(d) Listing staff and we look forward to reviewing the final list submittal.

Please find enclosed EPA's detailed comments. We have several significant concerns regarding the use of the rotating basin approach, the incomplete analysis of all pollutant parameters, the thoroughness of the review of all existing and readily available data and the methodology used to implement a number of criteria, included dissolved oxygen in the Tualatin. The EPA also disagrees with several proposed delistings and believes those specific waters should remain listed. The EPA is very willing to work with ODEQ to address these concerns before the final submittal of the 2012 IR.

The EPA hopes ODEQ will find the enclosed comments useful in finalizing the 2012 IR. If you have any questions or would like to discuss our comments further, please feel free to contact me at (206) 553-6694, or have your staff contact Jill Fullagar of my staff at (206) 553-2582.

Sincerely,

A handwritten signature in blue ink that reads "David Croxton".

David Croxton
Manager, Watershed Unit

Enclosure

cc: Jennifer Wigal, ODEQ (electronic)
Debra Sturdevant, ODEQ (electronic)